Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board's Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: Therma-Tru Corporation Facility Name: Therma-Tru Virginia, LLC

Facility Location: 3000 Mine Road

Fredericksburg, Virginia 22408

Registration Number: 40331 Permit Number: FSO40331

December 1, 2003
Effective Date
December 1, 2008
Expiration Date

Robert G. Burnley
Director, Department of Environmental Quality

Signature Date

Permit Conditions, 30 pages

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I. Facility Information

Permittee

Therma-Tru Corporation 3000 Mine Road Fredericksburg, Virginia 22408

Responsible Official

Mr. Gregory Menke General Plant Manager

Facility

Therma-Tru Virginia, LLC 3000 Mine Road Fredericksburg, Virginia 22408

Contact Person

Mr. Gregory Menke General Plant Manager (540) 898-5700

AFS Identification Number: 51-177-0039

Facility Description: Therma-Tru Virginia, LLC produces miscellaneous metal parts which are fabricated and assembled into metal entrance doors, insulated doors and chimney products. The facility contains door and chimney products manufacturing lines, one Ransburg automated paint spray booth line, drying/curing units, silk screening, and touch-up spray booths.

Foam-Insulated Entrance Doors

SIC Code 3442, Metal Door, Sash, Frames, Molding, and Trim.

Metal door skins are fabricated from a steel coil. The door skin is either rapped around expanded-polystyrene (EPS) foam panels or filled with urethane foam to create insulated doors.

EPS foam panels are cut with a hot wire. Adhesive holds the panels inside the door skin while the door skin seams are welded closed.

Urethane doors are manufactured as follows. The door skins are welded closed and placed in door presses. The door skin cavity is filled with a foam mixture of polyisocyanate (A-foam), urethane polyol (B-foam) and HCFC-22 blowing agent. The foam is cured in the door press.

Manufactured Doors and Subassemblies

SIC Code 3089, Plastic Products, Not Elsewhere Classified. SIC Code 3442, Metal Doors, Sash, Frames, Molding and Trim

Manufactured doors and miscellaneous subassemblies are surface coated in spray booths. The Ransburg automated coating system applies coating on manufactured entrance doors, metal parts, wood parts, and polymetric substrates. Manual spray paint booths are used to paint manufactured doors and door samples, and are used to touchup repair of doors. The spray application area is vented through dry filters to collect overspray.

Metal Chimney Flue and Other Miscellaneous Metal Parts SIC Code 3443, Fabricated Plate Work

Located in the G-building, the metal chimney flue products are fabricated on-site from sheet metal. A manual spray paint application booth is used to paint the product. The spray booth overspray is collected by a dry filter. Some products are silk screened to overlay a design pattern on the product. An infra-red oven is used to cure the coatings.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Finishing	Operatio	n- Entrance Doors					
01, 02	01, 02	Two manual spray paint guns and two ventilated spray paint booths for repair and touchup of entrance door product. (estimated installation date 1984)	1.5 pounds solvent each	Paint Arrestor 3000 filter or equivalent	01, 02	PM ₁₀	-
03	03	Ransburg System Paint Drying Oven - LPG Fired Paint Drying Oven (Blue Surf 1730-B)	1.9 mmBtu/hr	-	-	VOC	-
04, 05	04, 05	Two drying areas (solvent flash off area) with two local exhaust ventilation systems for Ransburg Paint Line (estimated installation date 1976)	-	-	-	-	-
06	06	Manual spray paint gun and ventilated booth for precoating of entrance doors (estimated installation date 1976)	390 pounds solvent	Paint Arrestor 3000 filter or equivalent	06	PM ₁₀	-
07, 08	07, 08	Ransburg automated spray paint application system with two vented coating application booths	308 pounds solvent	Paint Arrestor 3000 filter or equivalent	07, 08	PM ₁₀	October 2, 2003

		(estimated installation date 1976)					
09	09 Fugitive	Ransburg Paint Mix Room - Paint solvent storage and mixing	-	-	-	VOC	-
191	191	Automated spray booth for application of powder coatings on metal parts (estimated installation date 1995)	360 pounds	Koch high efficiency filter or equivalent	191	PM10	-
Finishing	Operation	n - G Building Fabricated Metal, C	himney Prod	ucts, and Miscellan	eous Shee	et Metal Par	rts
16	16	Manual spray paint gun and ventilated booth for metal fabricated venting (flue) products (estimated installation date 1978)	13 pounds solvent	Paint Arrestor 3000 filter or equivalent	16	PM ₁₀	October 2, 2003
17	17	Silk screen paint applicator and infra-red drying oven for coating metal fabricated venting products (estimated installation date 1978)	2.6 pounds solvent	-	-	-	-
187	187 Fugitive	Chimney Products Paint Mix Room - Paint & Solvent Storage and Mixing	-	-	-	VOC	-
Entrance	Entrance Door Assembly						
185	185 Fugitive	framing assemblies.	50 doors/hr	-	-	VOC	-
199	199 Fugitive	Door Window Glazing X-Y Applicator	3.8 gals/hr	-	-	VOC	

^{*}The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Process Equipment Requirements for Automated Ransburg Spray Paint Coating System (emission units 01, 02, 03, 04, 05, 06, 07, 08, and 09); Door Assembly (emission units 185 and 199); G-Building Fabricated Metal and Chimney Products (emission units 16, 17, and 187); and Automated Spray Booth for Application of Powder Coating on Metal Parts (emission unit 191 and 192)

A. Limitations

1. Particulate emissions from the Ransburg coating system (emission units 01, 02, 06, 07, and 08) shall be controlled by Paint Arrestor 3000 filters or equivalent. The filters shall be properly placed and maintained whenever the spray booths are in use. The filters shall be provided with adequate access for inspection.

Particulate emissions from the G-building fabricated metal and chimney products coating operations (emission unit 16) shall be controlled by Paint Arrestor 3000 filters or equivalent. The filters shall be properly placed and maintained whenever the spray booths are in use. The filters shall be provided with adequate access for inspection.

Filters providing an equivalent or greater control efficiency than that of the Paint Arrestor 3000 filters, specified in the original permit application, may be installed on each coating system. The source shall maintain manufacture's specifications including, but not limited to, the control efficiency of each substitute filter and the Paint Arrestor 3000 filter. Such records shall be maintained on the plant site for at least five years from the date of the installation of the substitute filter.

(9 VAC 5-80-110, 9 VAC 5-80-10 H, and Condition 4 of October 2, 2003, Permit)

2. Particulate emissions from the automated spray booth operation for application of powder coatings on metal parts (emission unit 191) shall be controlled by Koch High Efficiency filters or equivalent. The filters shall be properly placed and maintained whenever the spray booths are in use. The filters shall be provided with adequate access for inspection.

Filters providing an equivalent or greater control efficiency than that of the Koch High Efficiency filter may be installed on the powder coating application system. The source shall maintain manufacture's specifications including, but not limited to, the control efficiency of each substitute filter and the Koch filter. Such records shall be maintained on the plant site for at least five years from the date of the installation of the substitute filter.

(9 VAC 5-80-110)

3. Combined volatile organic compound (VOC) emissions from the Ransburg coating system (emission units 01 through 09) shall not exceed 30.0 tons per month and 240.0 tons per year, calculated monthly as the sum of each consecutive twelve month period.

Compliance with the monthly emission limit shall be demonstrated on a calendar month basis by using DEQ approved methods such as material balance calculations, pollutant-specific emission factors and/or recordkeeping. Compliance with the annual emission limit shall be demonstrated monthly on a rolling twelve month basis by using DEQ approved methods such as material balance calculations, pollutant-specific emission factors and/or recordkeeping. The permittee shall submit the compliance method and changes to the compliance method to the DEQ, Northern Virginia Regional Office for approval by the Air Compliance Manager. The initial compliance method shall be submitted to the DEQ for approval within thirty days of issuance of this permit. Changes to the compliance method shall be submitted to the DEQ for approval at least thirty days prior to the effective date requested by the permittee.

(9 VAC 5-80-110 and Condition 5 of October 2, 2003, Permit)

4. Volatile organic compound emissions from the G-building fabricated metal and chimney products coating operation (emission units 16, 17, and 187) and shall not exceed 6.3 tons per month and 50.0 tons per year, calculated monthly as the sum of each consecutive twelve month period.

Compliance with the monthly emission limit shall be demonstrated on a calendar month basis by using DEQ approved methods such as material balance calculations, pollutant-specific emission factors and/or recordkeeping. Compliance with the annual emission limit shall be demonstrated monthly on a rolling twelve month basis by using DEQ approved methods such as material balance calculations, pollutant-specific emission factors and/or recordkeeping. The permittee shall submit the compliance method and changes to the compliance method to the DEQ, Northern Virginia Regional Office for approval by the Air Compliance Manager. The initial compliance method shall be submitted to the DEQ for approval within thirty days of issuance of this permit. Changes to the compliance method shall be submitted to the DEQ for approval at least thirty days prior to the effective date requested by the permittee.

(9 VAC 5-80-110 and Condition 6 of October 2, 2003, Permit)

5. In no case shall the sum total VOC emissions from the Ransburg coating system (emission units 01 through 09), the Automated Powder Coating spray booth (emission unit 191), the Door Assembly lines (emission units 185 and 199), and the G-Building fabricated metal and chimney products coating operation (emission units 16, 17, and 187) exceed 248.0 tons per year.

Annual emissions shall be calculated monthly as the sum of each twelve consecutive month period.

Compliance with annual emission limits shall be demonstrated monthly on a rolling twelve month basis by using DEQ approved methods such as material balance calculations, pollutant-specific emission factors and/or recordkeeping. The permittee shall submit the compliance method and changes to the compliance method to the DEQ, Northern Virginia Regional Office for approval by the Air Compliance Manager. The initial compliance method shall be submitted to the DEQ for approval within thirty days of issuance of this permit. Changes to the compliance method shall be submitted to the DEQ for approval at least thirty days prior to the effective date requested by the permittee.

(9 VAC 5-80-110 and Condition 7 of October 2, 2003, Permit)

 Particulate emissions from the automated spray booth application of powder coatings on metal parts (emission unit 191) shall not exceed 4.10 x P ^{0.67} pound per hour, where P equals 0.18 tons per hour maximum throughput of powder coating.

Compliance with the hourly emission rate shall be demonstrated by using DEQ approved methods such as material balance equations, pollutant-specific emission factors, and/or recordkeeping. The calculated average particulate mass emission rate shall be expressed in pounds per hour and shall be averaged over a calendar month period. The permittee shall submit the compliance method and changes to the compliance method to the DEQ, Northern Virginia Regional Office for approval by the Air Compliance Manager. The initial compliance method shall be submitted to the DEQ for approval within thirty days of issuance of this permit. Changes to the compliance method shall be submitted to the DEQ for approval at least thirty days prior to the effective date requested by the permittee. (9 VAC 5-80-110 and 9 VAC 5-40-260 C)

- 7. Visible emissions from the following exhaust stacks shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60% opacity:
 - a. Ransburg spray paint coating system (emission units 01 through 08) (stack ID numbers 01 through 08);
 - b. G-building fabricated metal and chimney products coating operation (emission units 16 and 17) (stack ID numbers 16 and 17); and
 - c. Automated spray booth operation for application of powder coatings on

metal parts (emission units 191 and 192) (stack ID numbers 191 and 192).

(9 VAC 5-40-80 and 9 VAC 5-80-110)

8. At all times, the disposal of VOCs shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.

(9 VAC 5-80-110, 9 VAC 5-40-20 F, and 9 VAC 5-50-20 F)

- 9. In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, to include the Paint Arrestor 3000 filters and Koch High Efficiency Filters (or filters with equivalent or greater particulate emission reduction), the permittee shall:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts that are needed to minimize the duration of air pollution control equipment breakdowns.
 - Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of air pollution control equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

These records shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request. (9 VAC 5-80-110 and Condition 14 of October 2, 2003, Permit)

- 10. Reasonable precautions shall be taken to minimize the discharge of emissions from cleaning or purging operations and may include the following:
 - a. Use of a capture and control device or both;
 - b. Use of detergents, high pressure water or other nonvolatile cleaning methods;

- c. Minimization of the quantity of volatile organic compounds used to clean lines of equipment; and
- d. Adjustment of production schedules to minimize coating changes thereby reducing the need for frequent cleaning or purging of a system.

(9 VAC 5-80-110)

B. Monitoring

- 1. The permittee shall perform daily inspections of all spray booth filters (PCDs and stack IDs 01, 02, 06, 07, 08, 16, and 191) to verify the placement, integrity and particle loading of the filters. The daily inspections for a particular spray booth's filters are only required when the particular spray booth is in operation during any part of the affected calendar day. A log of the daily inspections shall be maintained and shall include the following data:
 - a. The date of the inspection;
 - b. The condition of the particular spray booth filter system; and
 - c. Any corrective action taken on a particular spray booth filter system.

(9 VAC 5-80-110)

2. The permittee shall periodically monitor emissions of VOC from emission units 01 through 09, 191, 16, 17, 187, 185, and 199 by using DEQ approved methods such as material balance calculations, pollutant-specific emission factors and/or recordkeeping. The permittee shall submit the periodic monitoring method and changes to the periodic monitoring method to the DEQ, Northern Virginia Regional Office for approval by the Air Compliance Manager. The initial periodic monitoring method shall be submitted to the DEQ for approval within thirty days of issuance of this permit. Changes to the periodic monitoring method shall be submitted to the DEQ for approval at least thirty days prior to the effective date requested by the permittee.

The periodic monitoring shall be conducted on a calendar month basis. Annual VOC emissions shall be calculated on a monthly basis by summing VOC emissions for each consecutive twelve month period. (9 VAC 5-80-110)

3. The permittee shall conduct weekly visual emission inspections on the exhaust of each spray booth associated with the Ransburg, G-Building fabricated metal and chimney products spray paint operations, and the automated powder coating operation (stacks ID numbers 01 through 08, 16,

17, 191 and 192) during daylight hours and when the spray booths and associated control devices are operating under conditions which the permittee defines as representative performance of such equipment. Operation during periods of startup, shutdown and malfunction shall not constitute representative conditions for the visual emission inspections. Visual inspections shall consist of a visual survey of the exhaust stacks over a minimum time period of 2-minutes to identify if there are visible emissions, other than condensed water vapor. If there are no visible emissions observed during this period, record this fact and no further action is necessary for this particular weekly inspection. If any visible emissions other than condensed water vapor are observed, the permittee shall:

- a. Determine if the equipment and control device causing the visible emissions are operating according to manufacturer's specifications or other site-specific acceptable operating conditions.
 - (1) If the equipment and control device are operating properly, the permittee shall conduct a visible emission evaluation (VEE) using a certified observer in accordance with 40 CFR 60, Appendix A, Method 9 for a minimum of six minutes. If the average opacity of the emissions from any of the spray booth stacks exceed their opacity limit during any six minute period observation, then a VEE in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted immediately on the affected spray booth exhaust stack(s) for a consecutive sixty (60) minute period to determine compliance with the applicable opacity limit; proceed with the action in item c. below.
 - (2) If the equipment or control device is not operating properly, the permittee shall take corrective action(s) immediately to eliminate the excess emissions and proceed with action in item b. below.
- b. Conduct a visible emission evaluation (VEE) using a certified opacity reader in accordance with Method 9 (40 CFR Part 60, Appendix A) for a minimum of six minutes if the corrective action(s) taken in item a., above, does not rectify the opacity problem within 24 hours. Conduct such a test at least once each daylight shift until corrective action(s) taken allows the affected equipment and the associated control device to operate properly. If corrective action allows the equipment and the control device to operate properly, but visible emissions are still observed, the permittee shall conduct a VEE in accordance with 40 CFR 60, Appendix A, Method 9 for a minimum of six minutes. If an exhaust stack's average opacity exceeds its opacity limit during any six minute period of observations, then a VEE in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted immediately on the affected unit's exhaust stack for a consecutive sixty

minute period to determine compliance with the applicable opacity limit. Proceed with action in item c. below.

c. Record the weekly results of visible emission inspections, the substance of any corrective action, and the results of all visible emission evaluations conducted in accordance with Method 9 (40 CFR Part 60, Appendix A). (9 VAC 5-80-110)

C. Recordkeeping

- The permittee shall maintain records of the results of the air pollution control device monitoring inspections required in Section III.B.1. (9 VAC 5-80-110)
- 2. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the DEQ, Northern Virginia Regional Office, Air Compliance Manager. These records shall include, but are not limited to:
 - a. Name of each product (coating, diluent, or other raw material) containing VOC; its Material Safety Data Sheet (MSDS) and/or its certified product data sheet; its VOC content on a percent weight basis; and its density.
 - b. The monthly and annual throughput in tons for each coating (undiluted), diluent, cleaning agent, and any other solutions containing VOCs that are utilized by the entrance door coating operations, including the Ransburg coating line (emission units 01, 02, 06, 07, 08, and 09).
 - c. The monthly and annual throughput in tons for each coating (as purchased and/or undiluted), diluent, cleaning agent, and any other solutions containing VOCs that are utilized by the G-building fabricated metal and chimney products coating operations (emission units 16, 17, and 187).
 - d. Monthly and annual throughput of raw materials used in the manufacture of entrance doors (emission units 01, 02, 06, 07, 08, 09, 191, 185, and 199) and fabricated metal chimney products (emission units 16, 17, and 187).
 - e. Monthly and annual VOC emissions (in tons) from the entrance door coating operation (emission units 01, 02, 06, 07, 08, and 09).
 - f. Monthly and annual VOC emissions (in tons) from the G-Building coating operation and manufacturing operations (emission units 16, 17, and 187).

- g. Monthly and annual VOC emissions (in tons) from all coating operations (emission units 01 through 09, 191, 16, 17, and 187) and entrance door assembly operations (emission units 185 and 199).
- h. The date and time when filters providing an equivalent or greater control efficiency than the Paint Arrestor 3000 filters are installed on any of the components of the coating application systems or fabricated metal and chimney products coating operations (emission units 01, 02, 06, 07, 08, and 16).

The date and time when filters providing an equivalent or greater control efficiency than the Koch High Efficiency filters are installed on any of the components of the automated powder coating spray booth (emission unit 191).

- i. The monthly and annual throughput in units of mass for each powder coating used on the powder coating line (emission units 191).
- Calculated average particulate mass emission rate for emission unit 191, expressed in pounds per hour and averaged over each calendar month period.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years. Annual emissions shall be calculated and recorded each month by summing emissions over each consecutive twelve month period.

(9 VAC 5-50-50, 9 VAC 5-80-110, and Condition 8 of October 2, 2003, Permit)

- 3. A record of each visible emissions observation shall be maintained, including any data required by 40 CFR 60 Appendix A, Method 22 or Method 9, as appropriate (stack ID numbers 01 through 08, 16, 17, 191, and 192). The record shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.
 (9 VAC 5-80-110 F)
- 4. The permittee shall maintain on site records, for a period of five years, of all scheduled and non-scheduled maintenance on air pollution control equipment and process equipment which affect air pollution emissions. These records shall be made available to DEQ personnel upon request. (9 VAC 5-80-110 and Condition 14 of October 2, 2003, Permit)
- 5. The permittee shall maintain records necessary to demonstrate the four Gumser door filling and pressing stations (emission units 20A, 21A, 22, and

23A) are insignificant emission units for criteria pollutants and hazardous air pollutants.

(9 VAC 5-80-110 and 9 VAC 5-80-720 B)

D. Testing

- The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the DEQ, test ports shall be provided at the appropriate locations. (9 V AC 5-40-30 and 9 V AC 5-80-110)
- 2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use test methods in accordance with procedures approved by the DEQ or DEQ pre-approved alternative test methods, including the following:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a
VOC Content	EPA Methods 24
Visible Emission	EPA Method 9, 22

(9 VAC 5-80-110)

E. Reporting

- The permittee shall submit the following information according to a schedule to be arranged with the DEQ, Northern Virginia Regional Office, Air Compliance Manager:
 - a. Monthly, quarterly, and annual coating dispensed (undiluted) and solvent throughput for the entire facility;
 - Monthly, quarterly, and annual VOC emissions from the entrance door products coating operations (emission units 01 through 09, 191, and 192);
 - Monthly, quarterly, and annual VOC emissions from the G Building fabricated metal and chimney products coating operations (emission units 16, 17, and 187);
 - d. Monthly, quarterly, and annual VOC emissions from the entire facility (emission units 01 through 09, 191, 192, 16, 17, 187, 185, and 199);
 - e. Monthly, quarterly, and annual report of instances when the opacity of an

exhaust stack (stack ID numbers 01 through 08, 16, 17, 191, and 192) exceeds its permitted opacity limit, as measured by the procedures in 40 CFR 60 Appendix A Method 9; and

f. Monthly, quarterly, and annual mass of each power coating applied on the powder coating line (emission unit 191).

Annual emissions and throughput shall be calculated monthly by summing emissions and throughputs for each consecutive twelve month period.

(9 VAC 5-80-110 and Condition 9 of October 2, 2003, Permit)

IV. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80- 720 B)	Rated Capacity (9 VAC 5-80- 720 C)
18A	Door Frame Latex Painter	9 VAC 5-80-720 B	VOC	-
18B	Door and Door Frame Woodworking	9 VAC 5-80-720 B	PM ₁₀	-
19	Expanded Polystyrene (EPS) Foam Panel Cutting Using Electrical Resistance (Hot) Wire	9 VAC 5-80-720 B	VOC, Styrene	-
20	A-1 Line Foam Press Boiler (Valiant), LPG or No. 2 Fuel Oil Fired	9 VAC 5-80-720 B and C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ lead	0.21 mmBtu/hr
20A	Gumser door filling and pressing system (urethane foam fill and door press Line A1) (estimated installation date 1987)	9 VAC 5-80-720 B	4,4' diphenylm ethane diisocyanat e (MDI)	-
21 A	Gumser door filling and pressing system (urethane foam fill and door press Line A3) (estimated installation date 1992)	9 VAC 5-80-720 B	MDI	-
22	Gumser door filling and pressing system (urethane foam fill and door press Line B1) (estimated installation date 1976)	9 VAC 5-80-720 B	MDI	-

23A	Gumser door filling and pressing system (urethane foam fill and door press Line B2, D-Building) (estimated installation date 1980)	9 VAC 5-80-720 B		-
173	Pressurized Vertical Storage Tank for "B" (urethane polyol) foam storage (estimated installation date 1978)	9 VAC 5-80-720 B	MDI	-
174	Pressurized Vertical Storage Tank for "B" (urethane polyol) foam storage (estimated installation date 1983)	9 VAC 5-80-720 B	MDI	-
23	B-2 Line Foam Press Boiler (Burnham P-207W), LPG Fired	9 VAC 5-80-720 B and C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ lead	0.2 mmBtu/hr
24	Space Heating Unit (Powr-Matic TE-41) No. 2 Fuel Oil Fired	9 VAC 5-80-720 A and B	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ lead	1.8 mmBtu/hr
26	B-1 Line Foam Press Boiler (Burnham, No. 7501171), LPG or No. 2 Fuel Oil Fired	9 VAC 5-80-720 B and C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ lead	0.39 mmBtu/hr
27	Make-Up Air Heater (Powr-Matic MA-80), No. 2 Fuel Oil Fired	9 VAC 5-80-720 A, B, and C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ lead	0.9 mmBtu/hr
28	A-3 Line Foam Press Boiler (Burnham V-36-WB), LPG or No. 2 Fuel Oil Fired	9 VAC 5-80-720 B and C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ lead	0.32 mmBtu/hr
163	Hydraulic Oil/Water Separator/Evaporator, No. 2 Oil Fired	9 VAC 5-80-720 B and C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ , lead	0.2 mmBtu/hr
165	Paint Hook Cleaning Oven LPG Fired	9 VAC 5-80-720 B and C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ , lead	2.0 mmBtu/hr
166	MEK Storage Tank	9 VAC 5-80-720 B	VOC, MEK	3,000 gallons
167	MEK Storage Tank	9 VAC 5-80-720 B	VOC, MEK	3,000 gallons
169	Bulk Tank R-22 Blowing Agent	9 VAC 5-80-720 A	-	-
170	Adhesive Used for Adhering EPS Foam Panels to Door Skins	9 VAC 5-80-720 B	VOC, MDI	-
171	A-Foam Storage Tank	9 VAC 5-80-720 B	VOC, MDI	-
172	A-Foam Storage Tank	9 VAC 5-80-720 B	VOC, MDI	-
175	No. 2 Oil Storage Tank	9 VAC 5-80-720 B	VOC	-
176	No. 2 Oil Storage Tank	9 VAC 5-80-720 B	VOC	-
177	No. 2 Oil Storage Tank	9 VAC 5-80-720 B	VOC	-
178-182	Entrance Door Skin	9 VAC 5-80-720 B	PM ₁₀ , VOC	-

	Manufacturing Line - metal cutting, shaping, arc welding, gluing, and caulking of door skins			
183	Steel Lite Frame Manufacturing - metal cutting, shaping, spot welding, and caulking of door window frames	9 VAC 5-80-720 B	PM ₁₀ , VOC	-
184	Side Lite Frame Manufacturing - metal cutting, shaping, gluing and caulking of side window frames for entrance door modules	9 VAC 5-80-720 B	PM ₁₀ , VOC, MDI	-
186	Chimney Products Fabrication - metal cutting, shaping and spot welding in the production of sheet metal assemblies	9 VAC 5-80-720 B	PM ₁₀	-
188	Chimney Products Test Product LPG Fired Heater	9 VAC 5-80-720 B, C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ , lead	0.10 mmBtu/hr
189	Maintenance Shop Parts Washer - 24 in. by 30 in. cold cleaning unit. (five gallon capacity)	9 VAC 5-80-720 B	VOC	-
190	Machine Shop LPG Fired Heat Treating Furnace	9 VAC 5-80-720 B, C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ , lead	0.12 mmBtu/hr
192	LPG Fired Paint Curing Oven For Powder Coating System	9 VAC 5-80-720 B, C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ , lead	2.5 mmBtu/hr
193	Diesel Fired Power Generator No. 1 for Emergency Fire Water Pump	9 VAC 5-80-720 B, C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ , lead	255 HP
194	Diesel Fired Power Generator No. 2 for Emergency Fire Water Pump	9 VAC 5-80-720 B, C	PM ₁₀ , VOC, CO, SO ₂ , NO ₂ , lead	255 HP
195	Diesel Fuel Storage Tank	9 VAC 5-80-720 B	VOC	-
196	LPG Storage Tanks	9 VAC 5-80-720 A, B	VOC	-
197	Plasma Metal Cutting	9 VAC 5-80-720 B	PM_{10}	-
198	Foam Residue Cleaner/Heater	9 VAC 5-80-720 B, C	Ethylene Glycol	4000 Btu/hr Propane Ethylene Glycol Bath Heater

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

V. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
9 VAC 5-40 Article 34	Emission Standards for	The provisions of this article
9 VAC 5-40-4760 et seq.	Miscellaneous Metal Parts	apply only to sources of
	and Coating Application	VOCs in VOC control areas
	Systems	designated in 9 VAC 5-20-
		206.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law. (9 VAC 5-80-140)

VI. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and

complete application for renewal to the DEQ consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

- 1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- 2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
- No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
- 4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- 5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

- All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.

- c. The company or entity that performed the analyses.
- d. The analytical techniques or methods used.
- e. The results of such analyses.
- f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

- Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (9 VAC 5-80-110 F)
- 3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
 - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- 1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
- 2. The identification of each term or condition of the permit that is the basis of the certification.
- 3. The compliance status.
- 4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
- 5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
- 6. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00) U. S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Northern Virginia Region, Fredericksburg Satellite Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for

more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition VII.C.3 of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Northern Virginia Region, Fredericksburg Satellite Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Northern Virginia Region, Fredericksburg Satellite Office.

(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

L. Duty to Submit Information

- The permittee shall furnish to the Board, within a reasonable time, any
 information that the Board may request in writing to determine whether cause
 exists for modifying, revoking and reissuing, or terminating the permit or to
 determine compliance with the permit. Upon request, the permittee shall also
 furnish to the Board copies of records required to be kept by the permit and,
 for information claimed to be confidential, the permittee shall furnish such
 records to the Board along with a claim of confidentiality.
 (9 VAC 5-80-110 G.6)
- Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G. (9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the DEQ by April 15 of each year. The calculations and final

amount of emissions are subject to verification and final determination by the DEQ.

(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations. (9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. (9 VAC 5-50-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and

conditions of the permit.

- 2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- 4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

- 1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- 2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- 3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

 Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
 (9 VAC 5-80-150 E)

T. Transfer of Permits

- No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another. (9 VAC 5-80-160)
- 2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)
- 3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200. (9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

- 1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
- 2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
 - d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110

F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

- 3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
- 4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-110, 9 VAC 5-80-190 C, 9 VAC 5-80-260, and Condition 15 of October 2, 2003, Permit)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. (9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F. (40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150). (9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

- 1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
- 2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
- 3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)